

SECTION P – NON-EMERGENCY MEDICAL TRANSPORTATION

P.1 Describe in detail your proposed approach to providing non-emergency medical transportation (NEMT) services, including, at a minimum:

- *What administrative functions, if any, you will subcontract to another entity (If subcontracting this function, the subcontractor information must be provided in response to item F.4.);*
- *How you will determine the appropriate mode of transportation (other than fixed route) for a member;*
- *Your proposed approach to covering fixed route transportation;*
- *How you will ensure that pick-up and delivery standards are met by NEMT providers, including training, monitoring, and sanctions;*
- *How you will ensure that vehicles (initially and on an ongoing basis) meet vehicle standards, including inspections and other monitoring;*
- *Your approach to initial and ongoing driver training;*
- *How you will ensure that drivers meet initial and ongoing driver standards;*
- *How your call center will comply with the requirements specific to NEMT calls; and*
- *Your NEMT quality assurance program (excluding vehicle inspection).*

LHCC's Plan for the Provision of Non-Emergency Medical Transportation (NEMT)

Louisiana Healthcare Connections (LHCC) has a subcontract with LogistiCare for the provision of NEMT services in all GSAs. LogistiCare is an experienced, national NEMT program manager currently managing transportation programs serving Medicaid beneficiaries in 40 states, including Louisiana. Each year, LogistiCare coordinates more than 46 million trips for more than 16.8 million people, including Medicaid and Medicare beneficiaries, by developing and overseeing a network of more than 4,500 local commercial, public and non-profit transportation providers. LogistiCare is currently the transportation program manager for the three prepaid Bayou Health Plan Managed Care Organizations (including LHCC) and covers the entire state. LogistiCare currently facilitates access to covered services for LHCC members; in the future this will also include carved out services (such as dental and behavioral health services), and any expanded services that we will offer as part of the new

In Louisiana, LogistiCare's projected annual trips based on current contracts is expected to exceed 241,000, serving over 427,000 Bayou Health Plan members from plans across the state.

Contract. By subcontracting with an experienced transportation management company that is recognized as an industry leader and is able to operate on a large scale, we have improved the quality of service to members by improving their access-to-care experience. We have established NEMT policies and procedures that align with the current Louisiana Medicaid NEMT program, including those for transportation to and from Family Planning Services, and we contractually require LogistiCare to comply with LHCC and applicable Louisiana Medicaid NEMT guidelines, policies and procedures. LHCC understands that on occasion a member may request transportation to a provider who is located beyond DHH distances standards even though an appropriate in-network provider is available to the member within distance standards. When this type of request is received, we will determine whether or not to grant this request on a case-by-case basis. We will notify the member in writing of any limitations we make regarding their request. Further, as the Louisiana Medicaid NEMT program requirements, policies or procedures change, we will comply with such updates or changes, and we will require LogistiCare to implement and comply with current and any new requirements, policies and procedures.

NEMT Administrative Functions Subcontracted to LogistiCare

LHCC has subcontracted the full array of administrative functions related to the provision of NEMT services to LogistiCare. Below is the list of delegated administrative functions and services LogistiCare performs along with a brief description of each function:

- Call Center Operations
 - Fully staffed, 24/7 access, toll-free number exclusively for LHCC
 - Development of customized transportation protocols for LHCC members and NEMT providers
 - Eligibility Verification
 - Benefit Verification
 - Scheduling of one-way and round-trip transportation
 - Selection of most appropriate level of transportation, cost-effective transportation
 - Dispatch of trip assignments to NEMT providers
- Development of NEMT Provider Network
 - On-the-ground and telephonic recruitment activities
 - Credentialing
 - Contract execution
- Quality Management of NEMT Provider Network
 - On-site vehicle inspections
 - NEMT Provider Training Programs
 - Recredentialing
 - Driver Performance Monitoring
 - Continuous network adequacy monitoring
- NEMT Claims Management
 - Claims/Invoice Processing and Reconciliation
 - NEMT payment and remittance advice to providers
 - Submission of Encounter Data to LHCC
- Quality Management of Operational Functions
 - Complaints Reporting and Management
 - Call Center Performance Reporting
 - Provider Performance Reports

Determining the Appropriate Mode of Transportation

The process for determining the appropriate transportation resource for our members begins at the time the member, or someone calling on the member's behalf, requests transportation. Using LHCC's customized call script; LogistiCare's Customer Service Representatives (CSRs) gather information from the caller. The CSR asks a standard series of questions to ascertain the member has exhausted all other avenues for transport to their medical services prior to obtaining transportation through LHCC. Once benefit eligibility has been verified, the caller's answers to additional questions guide the CSR to select the most appropriate mode of transportation for the member. Below is a list of sample questions asked to determine the most appropriate mode of transportation and service level:

- Is the member ambulatory?

- Does the member use a wheelchair (W/C), walker or cane? If yes, what is the extent of use (i.e. if W/C, does member use it all the time)?
- What type of medical service or treatment is the member receiving?
- Are there steps/stairs at the pick-up or drop off locations?
- Is the member able to transfer into a sedan type vehicle?
- What type of wheelchair does the member have (i.e. standard, wide, electric, Geri-chair, scooter)?
- Does the member need to be accompanied to their medical appointment?
- Will the member need a vehicle that has additional safety equipment (i.e. safety restraints)?

CSRs document questions asked and answers given in the member's electronic file. All calls are digitally recorded and can be pulled for review as needed. Upon gathering all pertinent information about the member's ambulatory abilities and medical care needs, CSRs schedule the most appropriate level of transportation, such as a wheelchair van for persons using scooters or wheelchairs who need transfer assistance, while the member is on the telephone. Additional questions that CSRs are trained to ask members that also ensure the most appropriate level of transportation for persons with limited mobility related to a temporary condition, or persons who will be undergoing a medical procedure during their appointment include:

- Does the member have his or her own wheelchair?
- Is the member transferable (i.e., does not require a lift or ramp equipped vehicle)?
- Will the medical procedure impact the member's ability to walk following their appointment?

CSRs use mapping search engines while arranging transportation to ensure the most geographically appropriate location and shortest route is selected. If the member is receiving treatments for an extended time period (i.e. chemotherapy, dialysis) every effort is made to select the same transportation provider for the entire series of trips. If LogistiCare is unable to secure the same NEMT provider/driver, the facility and the member will be contacted prior to their first scheduled trip with the new provider/driver and advised of the change.

Advance Notice for Trip Reservations. Members are educated and informed via the member handbook and on our website to provide at least 48 hours advance notice prior to their need for transportation to a routine, scheduled appointment. However, transportation requests are not denied if the member requests same-day transportation for urgent care. If the member provides less than 48 hours advance notice for routine, preventive care, LogistiCare will remind the member of the need to call at least 48 hours before the appointment time to request transportation and will make every effort to schedule transportation. This reminder will be documented by LogistiCare and is available to LHCC at any time.

Use of Fixed Route Transportation

LogistiCare participates in regional transportation organizations, such as the South West Transit Association that many Louisiana transportation providers participate in, whose missions are to provide education, communication, and advocacy in their communities so that their residents have consistently positive public transportation services experiences. Through participation with these organizations, LogistiCare has continued to build a firm understanding of non-emergency medical public transportation needs and services in the numerous areas they serve, including Louisiana. LogistiCare also has established liaison relationships with transit agencies, such as the New Orleans Regional Transit Authority, to ensure they receive updated information on available routes and timely trip-planning advice

for member's trips. Using current fixed-route maps and data from these public transit systems enables the CSRs to determine the most efficient and cost-effective trip options. Also, LogistiCare's transportation management software application, LogistiCAD, contains a transportation module that can upload actual mass transit stops and routes. With the actual routes in the system, CSRs are flagged whenever a member's trip can be completed using mass transit. Based on the member's physical condition, LogistiCare is then able to assign the member to the most appropriate, lowest cost transportation, which may include fixed route transportation when the member agrees.

Determining Member Eligibility for Public Transit. Using LHCC's customized transportation protocols, LogistiCare identifies members for fixed route (i.e. public transit) services. In addition to asking the series of questions listed above, the CSRs confirm members' addresses and their ambulatory abilities by asking an additional series of questions designed to further determine whether public transit is appropriate for the member. For example, the CSR will ask the member if they are able to walk up to ¾ mile to the nearest bus stop or from the bus stop to the appointment site. Once all public transit check points have been verified, the CSR informs the member that they can use the public transit program in their area if they so choose.

Advance Notice and Reports. For public transit, members are asked to provide at least 10 days' notice prior to their appointment in order to ensure that the mailed passes arrive before their appointment date. In either case, LogistiCare confirms that the member was eligible at the time of the trip and that the trip was to a plan-approved service. Once this information is verified, these trips are entered into LogistiCAD and LogistiCare reports these trips to LHCC via monthly reports and encounter data.

Long Distance Transportation

LHCC requires LogistiCare to obtain prior authorization from LHCC for trip requests in excess of 50 miles one-way and trips to destinations across the state border. The prior authorization requirement serves as a safety net to ensure that the member is not experiencing an access to care issue that is necessitating the long distance trip. It gives us the opportunity to assist the member in finding a closer provider, if appropriate. It also helps to inform us whether the member's health status or mobility abilities have changed, or if the member has (previously unidentified) access to care issues or changes in health status that they had not made us aware of prior to their need for the long distance transport. The prior authorization requirement functions as a timely notice to the LHCC Care Coordination team that augments their efforts to assist the member in ensuring their access to the appropriate level of health care service is unimpeded.

Mileage Reimbursement

LHCC members have the right to choose the level of transportation they prefer and LogistiCare gives them information regarding the mileage reimbursement program that LHCC offers for a friend or family member who is qualified and available to transport the member. Reimbursement to drivers for mileage occurs within 10 business days of LogistiCare's receipt of a completed invoice, and mileage calculations are performed by LogistiCare after LogistiCare obtains confirmation that the member kept their appointment. This process minimizes fraud, waste or abuse of this type of transportation service.

Pick-Up and Delivery Standards

LHCC requires LogistiCare to incorporate DHH pick-up and delivery standards in its NEMT program and to include these standards in its NEMT policies and procedures. LHCC will also include DHH pick-up and delivery standards within its contract requirements for LogistiCare and requires these pick-up and delivery standards to be incorporated into LogistiCare's agreements with transportation providers. Drivers

are required to pick up the member within one hour of their scheduled appointment. This time may be increased for long distance trips as needed. Delivery to the appointment site shall be on time but no sooner than one hour prior to the scheduled appointment. Upon completion of the treatment or appointment, the member shall have to wait no more than one hour for transportation home. At no time shall the member be picked up prior to the completion of their treatment or appointment. Due to geography and terrain that drivers may encounter in some areas of the state, it is understood that trip time may exceed one hour, as appropriate to ensure safe transport.

Comprehensive Training Regarding Pick-Up and Delivery Standards. LogistiCare's Regional NEMT Manager, based in New Orleans, is responsible for training of all NEMT providers and drivers that provide transportation services to LHCC members in Louisiana. LHCC requires LogistiCare to train all transportation providers and drivers regarding pick up and drop off standards for LHCC members. A full description of LogistiCare's training programs for LogistiCare staff, NEMT providers and drivers is provided below (see *Initial and Ongoing Training for Drivers and Call Center Staff*).

Reminding Members to be Ready. To aid in ensuring a satisfactory transportation experience for all, members are also reminded regarding their role in timely pick-up and delivery. At the time of trip set up, the CSR reminds the member to be ready for their ride at least one hour prior to their appointment (or sooner if it is a long distance trip). CSRs remind members to call the NEMT toll-free number right away if they need to cancel or reschedule their ride or if the driver is late. By including members in the overall education of the NEMT program standards regarding pick-up and delivery timeframes, we promote a satisfactory experience for members, their health care providers and we assist drivers in providing timely, safe and excellent customer service to our members.

Trip Monitoring Activities. LogistiCare monitors pick-up and delivery practices and measures performance in several ways. Real time monitoring is facilitated through its call center. If a member has questions about a scheduled transportation event, they can call LogistiCare's 1-800 "Where's My Ride" phone line where the CSR immediately documents the call as a complaint to be captured in the complaint report generated each month. CSRs assist callers by contacting the transportation provider to inquire about the trip in question and to communicate the trip status to the member (for example, driver stuck in traffic but will be there within 10 minutes). If warranted, the CSR schedules another transportation provider for immediate pick up of the member. LogistiCare prepares and distributes *Provider Report Cards* to NEMT providers each month. Data regarding the NEMT provider's overall on time performance is captured in the provider report cards in two ways: 1.) percent of trips dropped off at the "A" leg destination on time or within 15 minutes of on time, and 2.) percent of trips picked up at the "B" leg destination on time or within 15 minutes of on time. Using URAC (Utilization Review Accreditation Commission) performance metrics as a guide, NEMT providers must score 95% or better to be considered within compliance. Provider Report Cards and monthly complaint reports are effective tools for improving driver behaviors for on time performance. These reports demonstrate to the transportation providers the sincerity of our expectations and our commitment to assisting drivers to succeed in providing the utmost in quality transportation services to LHCC members.

Sanctions/Disciplinary Actions. In the event a NEMT provider falls below established performance thresholds, LogistiCare develops a Corrective Action Plan (CAP) in order to give the provider the opportunity to improve performance prior to removing them from the network. The CAP may include limitations to the number or types of trips assigned to the transportation provider. It may include specific requirements regarding driver training or vehicle maintenance expectations along with other items to address specific performance inadequacies. The CAP may be developed by LHCC's Quality Department staff with input from the Quality Assessment and Performance Improvement Committee (QAPI Committee) or LogistiCare. If information or a complaint involving possible criminal activity or serious unsafe driving (i.e. drunk driver, accident) is received, LogistiCare immediately ceases to assign new trips with the NEMT provider in question and reassigns existing trips scheduled with that provider to another

provider while the complaint or situation is under investigation. LHCC complies and requires LogistiCare to comply with applicable DHH provider performance standards, such as drop-off times no sooner than one hour prior to the member's appointment time and wait times of less than one hour after the conclusion of an appointment for the member's ride home. LogistiCare's failure to meet certain NEMT performance standards for network drivers may lead to sanctions until performance levels are within compliance, or termination of the transportation agreement, and is specified in the Transportation Vendor Agreement between LHCC and LogistiCare. Further description of LHCC's Quality Assurance Program for NEMT services is provided below (*see NEMT Quality Assurance Program*).

How LHCC Ensures Vehicle Standards are Met

Regularly scheduled, semi-annual inspections of every vehicle in every NEMT provider's fleet is required by LogistiCare for initial and ongoing participation in the LHCC NEMT provider network. Vehicle inspections are conducted by qualified LogistiCare staff. Initial vehicle inspections are conducted during the credentialing phase of the provider contracting process. All vehicles must pass inspection in order for the provider to be credentialed.

**LogistiCare's Field Monitor...may
conduct surprise inspections of
vehicles at any time.**

Comprehensive Safety Inspections Performed. To ensure safe, well-maintained vehicles are used to transport members, LogistiCare requires each service vehicle to undergo a safety inspection twice a year with documentation of a "passing" score on each of the following criteria. Please note, the following list is not exhaustive and additional items may be added as required or as local and state laws pertaining to vehicle safety are changed or introduced. Each vehicle must display the NEMT provider's name and telephone number on the vehicle's exterior and interior and each sedan, van and wheelchair vehicle must have:

- an operating 2-way communication system between driver and provider (pagers are not acceptable)
- matching Vehicle Identification Number (VIN) on the vehicle and license plate
- a map of service area or GPS
- a windshield free of cracks (in accordance with local laws)
- working windshield wipers
- fully operational headlights, high beams, brake lights, reverse lights and tail lights
- fully operational turn signals
- a rear-view mirror and unobstructed view through back window using mirror
- at least one fully viewable and operational exterior mirror on driver's side
- tire tread depth of at least 1/16th of an inch
- fully functioning brakes
- fully operational emergency brakes
- operational opening and closing mechanisms for all windows
- operational opening and closing mechanisms (locks and handles) for all doors
- fully operational air conditioner and heater
- fully functional seat belts for all passengers
- functional interior lighting
- securely installed floor mats made of commercial grade anti-skid ribbed rubber material or carpeting

- a clean interior that is litter free and absent of tears or holes in seats, doors or ceiling
- signs posted in the vehicle (visible to passengers) stating “No smoking, eating or drinking” and “All passengers must use seatbelts”.

Additional certification and safety equipment required in every vehicle includes:

- an active vehicle registration for the vehicle
- a valid vehicle insurance card for the vehicle
- a supply of accident/incident report forms
- two extension seatbelts
- seatbelt cutters
- a First Aid kit, including:
 - a Spill kit (liquid spill absorbent, latex gloves, hazardous waste disposal bags, scrub brush, disinfectant and deodorizer)
 - Fire Extinguisher(s) mounted and secured within reach of the driver and visible to passengers for use in emergencies if the driver is incapacitated
- 3 Emergency Triangle Reflectors (flares are prohibited and may not be carried onboard)
- a spare tire and jack
- extra electrical fuses
- Operational flashlight
- Vehicles with step up entry must carry a retractable step, step stool, or running boards, as approved, to aid in passenger boarding
- Child safety seat, including booster seat, where appropriate
- Ice scraper

All wheelchair vehicles must meet the Americans with Disabilities Act (ADA) regulations. Such added regulations require wheelchair equipped vehicles to have:

- access doors with greater width to accommodate a wheelchair and attendant
- higher floor-to-ceiling headroom
- hydraulic lift mechanisms that require the driver to engage the engine-wheelchair lift interlock system (an important safety feature). Mini-vans with slide out ramps are not required to have a lift mechanism but should apply parking brake
- a metal mesh/non-skid plate and reflector tape at the end of the lift ramp
- a sturdy lift
- a sturdy safety rail, manual ramps or walk-on board
- operational lift controls that are accessible from inside and outside the vehicle
- four forward facing functional floor straps

Upon completion of the inspection, vehicles receive a pass, provisional or fail score. For vehicles passing inspection, a sticker denoting the month and year of the inspection along with the pass status is placed in the vehicle’s lower left windshield. A provisional score requires re-inspection within 10 days and is

denoted using a provisional sticker on the vehicle's lower left windshield with the expiration date. A fail score results in the placement of a fail sticker in the lower left windshield with the initial inspection month and year. Also the vehicle receiving a fail score must be removed from service until repairs are made and the vehicle passes re-inspection. Inspection forms are kept on file and are available for review by LHCC or DHH.

Additional Monitoring of Vehicles. Another tool LHCC will use to gather information regarding vehicle safety is the *Member Satisfaction Survey*. The LHCC Member Satisfaction Survey will contain a Vehicle Assessment section with a series of questions to capture the member's impression of the vehicle's condition. Examples of questions regarding vehicle condition include;

1. Was the heating or air conditioning working properly in the vehicle?
2. Was the vehicle clean on the inside?
3. Did the vehicle have working seat belts?
4. Were the vehicle windows intact and in good condition?
5. Was the company name visible on the outside of vehicle?

From time to time, a complaint may be filed by a member regarding the vehicle's condition. If the LHCC call center receives this or any NEMT-related complaint, the issue is documented, tracked and immediately reported to LogistiCare for follow up and resolution. If the complaint presents a safety issue (e.g. seatbelt not working) LogistiCare personnel conduct an onsite inspection of the vehicle in question and proceed with the implementation of corrective actions as warranted by the results of the inspection. Such action may include immediate removal of the vehicle from service and the development of a corrective action plan. Additionally, LogistiCare's Field Monitor, assigned to serve a particular "territory" of NEMT providers, may conduct surprise inspections of vehicles at any time if he/she suspects a vehicle safety or maintenance issue or is notified that a problem may exist. Regardless of the technique used to uncover vehicle safety practices, each complaint, inquiry and action is documented in the provider's file and reported to the Quality Improvement Committee at least once per year.

Initial and Ongoing Training for Drivers and Call Center Staff

Training for LogistiCare Call Center Staff. LogistiCare employs call center staff, several of whom are bilingual, and are qualified to deliver the highest level of NEMT customer service for LHCC members. LogistiCare provides initial and ongoing training for all CSRs. LogistiCare trains CSRs on Louisiana's unique geography, including the state's roads and highway infrastructure, available public transit systems and programs, as well as new and existing transportation services that are available in each parish, city or township. CSRs are also trained on correct pronunciation of cities, towns, surnames, and local cultural differences to ensure a positive and comfortable service experience for all members who receive transportation services through LogistiCare. Training for CSRs includes training on how to use GPS, how to use mapping search engines when assisting members and providers in scheduling transportation in order to use or recommend the most efficient route or the safest route when terrain or road conditions call for alternate transportation routes. LogistiCare's CSR training programs for LHCC are unique to Louisiana and guided by the transportation program protocols that are customized for LHCC and include items such as long distance trips that require prior authorization and pick-up and delivery standards. For example, CSRs are trained to answer calls from LHCC members as "Louisiana Healthcare Connections transportation services, how may I help you?" LogistiCare also trains all CSRs on how to use call center telephony equipment, including how to use TTY/TDD and translation services; telephone etiquette; and call center performance standards, such as speed to answer and hold times, that are required for LHCC. The core curricula of LogistiCare's Call Center staff training program also includes, but is not limited to the topics below, which are part of every CSR's initial orientation training:

- Overview of NEMT Program and division of responsibilities between LogistiCare and Transportation Providers
- Vehicle requirements
- Driver qualifications
- The use of attendants
- After hours scheduling procedures
- Complaint procedures
- Driver conduct
- How to ask appropriate, Plan-specific questions, in order to determine most appropriate level of transportation
- Driver customer service standards and requirements during pick-up, transport and delivery
- Scheduling procedures during regular operating hours, including criteria for determining the most appropriate mode of transportation for the Participant
- Urgent care procedures
- Criteria for trip assignment
- Dispatching and delivery of services
- Procedures for obtaining payment for authorized trips
- Denial and appeals procedures
- Wheelchair Safety
- Record keeping and documentation requirements for scheduling, dispatching and transporting, including completion of required logs

Comprehensive NEMT Provider and Driver Training Programs. LHCC and LogistiCare require each driver to attend driver training sessions conducted by LogistiCare. Driver attendance at each training session is captured and documented in the transportation provider's records that LogistiCare maintains in its LogistiCAD NEMT platform. LogistiCare's driver training program helps drivers to understand how their role is integral to the delivery of health care services for our members. Materials distributed to providers and drivers during the training session include handouts of the driver training program topics, defensive driver informational materials and handbooks, previous NEMT provider newsletters, and the Provider Operations Manual. LogistiCare provides additional driver training via its web portal that covers topics related to the unique transportation needs of persons with disabilities. These helpful training programs describe tips and techniques for helping a person from a bed or chair into a wheelchair and from a wheelchair into and out of a vehicle. The online driver training programs also express the importance of treating each passenger with dignity and respect and teaches drivers how to effectively communicate with individuals who have special needs or are cognitively impaired. Because there are sometimes frequent changes in drivers, *LogistiCare conducts driver training programs on an ongoing basis.* LogistiCare schedules training sessions that are conducted on site for newly hired drivers. The ongoing driver training sessions are well attended and their frequency helps to ensure all drivers receive proper training in a timely manner.

Safe Driver Training Supported by National Safety Organizations. LogistiCare facilitates the provision of safe driver training by the Community Transportation Association of America (CTAA) and the National Safety Council (NSC), both of which provide industry-best driver training programs. These organizations extend a discount to transportation companies that are part of LogistiCare's transportation network.

Local, On-site Training. LogistiCare's Regional NEMT Manager, based in New Orleans, is responsible for on-site training of all NEMT providers and drivers that provide transportation services to LHCC members. Initial orientation training for drivers and NEMT provider staff members (e.g. owners, dispatchers) also includes, but is not limited to the topics below:

- Overview of DHH and LHCC NEMT Program benefits and division of
- Driver customer service standards, including timely pick-up, transport and

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| responsibilities between LogistiCare and Transportation providers | delivery before and after appointments. |
| <ul style="list-style-type: none">• Trip scheduling procedures and requirements during regular operating hours• Driver, Attendant and Vehicle requirements• How to read and understand the trip request manifest• Trips for urgent care services• Driver Qualifications• Complaint procedures• Driver conduct and courtesy• How to report incidents, accidents and mishaps, separate from motor vehicle accidents | <ul style="list-style-type: none">• Trip scheduling procedures and requirements after normal business hours• Procedures for obtaining payment for authorized trips• Criteria for trip assignment |
| <ul style="list-style-type: none">• Driver performance standards• Invoicing and timely filing requirements | <ul style="list-style-type: none">• Dispatching and delivery of services• Trip Logs and submission requirements• Denial and appeals procedures• Wheelchair Safety• Record keeping and documentation requirements for scheduling, dispatching and transporting, including completion of required logs |
| <ul style="list-style-type: none">• Reporting suspected fraud, waste, abuse• LogistiCare's Quality Management Program | <ul style="list-style-type: none">• How to report motor vehicle accidents• Liquidated Damages – performance requirements• Operational standards of NEMT provider• Basic First Aid Informational Resources |

Training occurs during initial orientation sessions held on site for new drivers and transportation providers within their first 30 days of NEMT network participation. Additionally, information about LHCC's NEMT program and the benefits provided are posted on LHCC's web site, not only accessible by NEMT providers, but also for members and health care providers to access as well.

Ensuring Drivers meet Initial and Ongoing Driver Standards

Qualified Drivers. LogistiCare's credentialing process for NEMT providers and drivers was developed using URAC guidelines. Driver quality is ensured by applying the same credentialing criteria and standards for each NEMT provider, their drivers and their vehicles. LHCC reserves the right to disallow any driver from performing services under the Transportation Vendor Agreement between LHCC and LogistiCare. For acceptance in the LHCC NEMT provider network, each driver must meet or exceed the following standards:

1. Each driver must be legally licensed by the State of Louisiana, to operate the transportation vehicle to which he/she is assigned, and be at least 21 years of age.
2. Each driver shall receive training within 30 days of assignment to perform services under the Transportation Vendor Agreement between LHCC and LogistiCare, for defensive driving, first aid, CPR, "spill kit" use, biohazard removal, passenger assistance, safety and sensitivity training. Each driver shall also attend additional training sessions for ongoing safety and sensitivity.
3. Each attendant shall receive training within 30 days of assignment to perform services under the Transportation Vendor Agreement with LogistiCare, for first aid, CPR, passenger assistance, safety and sensitivity training.
4. Each driver must be competent in his or her driving habits.

5. Each driver must be courteous, patient and helpful to all passengers.
6. Each driver must be neat and clean in appearance.
7. No driver may have more than two (2) chargeable accidents or moving violations in the last year.
8. Each driver must have no prior convictions for a substance abuse or sexual crime or a crime of violence (confirmed through performance of criminal background checks of all drivers).
9. Drivers who are known abusers of alcohol or known consumers of narcotics or drugs/medications (checked as part of pre-employment screening and background checks) that would endanger the safety of members are not permitted. If the NEMT provider suspects a driver to be driving under the influence of alcohol, narcotics or drugs/medications that would endanger the safety of members, the NEMT provider shall immediately remove the driver from providing service.
10. Any individual who has had within the past three (3) years or currently has a suspended or revoked driver's license, commercial or other, is prohibited from driving for any purpose.
11. All drivers must pass screening of the Office of Inspector General Exclusion Program and other applicable exclusionary databases as required by DHH, which means they must not have been convicted for program-related fraud and patient abuse, licensing board actions, including default on Health Education Assistance Loans.

In the event of any changes or updates to the NEMT program that are initiated by Louisiana Medicaid or DHH, we will require LogistiCare to extend or augment the list above to align with any new requirements or changes, including other requirements that Louisiana Medicaid, DHH or LHCC deem appropriate as part of LogistiCare's NEMT provider credentialing program. Driver quality is also ensured through ongoing monitoring of driver performance using data collected from complaint reports, provider report cards, Quality/Service Improvement Plans, CAPs and information collected from Provider Relations, Member Services, and QM staff.

Driver Courtesy. Drivers are contractually required to extend courteous, respectful, safe and compliant service to members. Driver behavior of all kinds is tracked through the complaints process and LogistiCare mandates that transportation providers also have a meaningful system of monitoring their employed drivers in place. LogistiCare requires all network transportation providers to have access to these monitoring files at any time as a proactive measure so that any issues can be addressed and resolved as soon as possible.

Monitoring Driver Quality. LogistiCare continuously monitors drivers for safety and quality. Any driver failing to maintain proper licensing; failing an unannounced field inspection; receiving two moving violations and/or accidents where the driver was at fault; or failing a drug test is immediately removed from the program. LogistiCare field staff conducts unannounced visits to transportation provider facilities and to common pick-up and drop-off spots to monitor driver behavior. Any driver found to be out of compliance with contract requirements, as well as applicable local, State, or federal regulations; will be removed from service until LogistiCare verifies that such deficiencies have been corrected. Any deficiencies and actions taken are documented and become a part of the transportation provider's records that LogistiCare maintains in its LogistiCAD NEMT platform, and which is available to LHCC. The LogistiCAD system also provides a warning when claims representatives attempt to verify and process an invoice in which a driver or vehicle is not in 'active' status (good standing) for all compliance criteria. Any transportation services performed by non-active drivers or using suspended vehicles will be denied payment, which creates a powerful incentive for NEMT providers to adhere to compliance requirements.

Call Center Compliance with Requirements Specific to NEMT Calls

To ensure a consistently high level of quality customer service for members, LHCC requires the same call center performance standards of its NEMT program as is required for any other type of call made by members to LHCC. Calls we receive for NEMT services from LHCC members are warm transferred (i.e. the CSR stays on the line with the member until LogistiCare answers the call) to ensure high quality service and to enable quick connection to the LogistiCare call center. Like LHCC, LogistiCare uses the Avaya Communications Manager with Automatic Call Distribution (ACD) in its call centers to provide the required ACD functionality. LogistiCare uses TASKE Contact Call Management and Reporting Systems to carefully monitor, audit, and track all calls to measure their performance for continuous improvement and has achieved an outstanding track record for responsive service. TASKE provides a complete reporting suite using data from the Avaya ACD system, giving LogistiCare the flexibility to easily examine, aggregate, and report vital telephony data such as talk time, call volumes, speed to answer and call abandonment rates. LHCC requires LogistiCare to adopt the DHH call center performance standards, which are described below:

Call Center Activity	DHH Performance Threshold
Average Speed to Answer	<ul style="list-style-type: none"> 95% or more calls answered within thirty (30) seconds by a live person, or 100% of calls immediately directed to an automatic call pickup system with IVR options, and <1% of calls receive a busy signal
Average Calls Abandoned	≤ 5 %
Average Hold time	Three (3) minutes or less

Call Center Performance Reports. LogistiCare prepares and delivers standard and ad hoc call center performance reports to LHCC in accordance with contractual requirements. Using these performance reports, LHCC monitors LogistiCare’s call center performance to ensure they do not exceed thresholds as shown in the table above. In the event that LogistiCare’s call center performance thresholds fall below established standards, LHCC will increase meeting frequency with LogistiCare and will monitor LogistiCare’s call center performance more closely until performance requirements have been met. Concerns for improvements are discussed during Joint Operations Committee (JOC) meetings.

Depending on the extent of the performance deficiency LHCC implements a tiered approach to improve performance that starts with issuing a verbal warning (and suggested action plan) if this is a first-time occurrence. If the performance does not improve within a month, a formal Quality/Service Improvement Plan is implemented. Continued performance below standards would lead to a CAP and possible sanctions as outlined in the Transportation Vendor Agreement or as directed by LHCC’s QAPI Committee until call center performance levels are within compliance. Additional information about LHCC’s NEMT Quality Assurance Program is provided next.

In 2010, URAC rolled out the first ever accreditation certificate for transportation broker enterprises and LogistiCare was the first recipient of this distinguished accreditation.

NEMT Quality Assurance Program

LHCC's Quality Assurance (QA) Program was developed using National Committee for Quality Assurance (NCQA) guidelines. However, NCQA does not extend accreditation for NEMT programs, providers or program managers. Due to the unique, non-medical nature of the benefit and NEMT providers, the development of a sound accreditation process for NEMT has been slow, but is gaining speed. In 2010, URAC (Utilization Review Accreditation Commission) rolled out the first ever accreditation certificate for transportation broker enterprises and LogistiCare was the first recipient of this distinguished accreditation. The LHCC Quality Assurance Program for NEMT services incorporates specific DHH requirements for performance, oversight and outcomes and was developed in collaboration with LogistiCare. Key components of the NEMT Quality Assurance Program are outlined below.

A. Tracking and Reporting Key Performance Metrics

- Call Center Performance – metrics measured include call volumes, call duration, speed to answer, abandonment rates, and average hold times
- NEMT Provider Performance – metrics measured include, but not limited to, on time performance, complaint rates, passenger satisfaction (via Member Satisfaction Surveys), vehicle maintenance
- Driver Performance – metrics measured include on time performance, complaint rates, training and certifications
- Complaint Management and Reporting – metrics measured include complaint rates by provider and call center, complaint type, complaint severity, resolution rates, CAPs

B. Report Preparation and Distribution

- Call Center Statistics – reports prepared and delivered monthly or more frequently per client requirements
- Trip Volume Report – delivered monthly or per client requirements
- Complaints Resolution Report – delivered monthly or per client requirements
- NEMT Provider Report Cards – delivered monthly

C. Conducting Surveys

- Members – conducted at least annually by LHCC
- NEMT Providers – conducted annually or per LHCC requirements
- Health Care Providers - conducted at least annually by LHCC

D. Training and Ongoing Service Support

- Call Center staff – training conducted for new staff and ongoing training for existing staff
- Drivers – for new drivers and ongoing training for established drivers
- NEMT Providers - for new NEMT providers and ongoing training for established providers
- Operations Manuals – updated at least annually and distributed to all contracted NEMT providers

E. Credentialing and Recredentialing

- Drivers - must have/pass necessary licensure, certification, and background checks
- NEMT Providers - must properly maintain vehicles and conduct appropriate business practices
- NEMT Providers and Drivers - must implement mechanisms to protect PHI (Protected Health Information)

- LogistiCare – must demonstrate commitment to quality through URAC accreditation

F. Information Security

- HIPAA Compliance – required in all operational areas and for all system functions for LogistiCare, NEMT providers and drivers and applicable employees, business associates and subcontractors
- Protecting Member PHI – required in all operational areas and for all system functions for LogistiCare, NEMT providers and drivers and applicable employees, business associates and subcontractors

G. Risk Management

- Field Inspections – all vehicles and driver records undergo onsite inspection
- Trip Audits – conducted routinely and compared against claims and reservation records to uncover fraud and abuse
- Accident and Incident Disclosure – all drivers must report accidents or incidents and are trained on procedures to follow

As noted in the call center performance section above, depending on the extent of a performance deficiency, LHCC implements a tiered approach to improve performance that starts with issuing a verbal warning (and suggested action plan) if it is a first occurrence and not related to the results of a formal audit. If performance does not improve after the verbal warning, the next disciplinary tier is the implementation of a formal Quality/Service Improvement Plan. Continued performance below standards would then lead to a CAP and possible sanctions as outlined in the Transportation Vendor Agreement or as directed by LHCC's QAPI Committee. If LogistiCare's oversight performance of its provider network falls below LHCC's established performance thresholds, LHCC develops a written performance improvement plan. For example, if LogistiCare's audit score (audit performed by LHCC quarterly) is less than 80%, LHCC will implement a Quality/Service Improvement Plan, or a CAP rather than a verbal warning. For vendors in good standing, such as LogistiCare, LHCC has established a quarterly JOC meeting. Measures are reviewed during those meetings along with any concerns for improvements. Additionally, LHCC's parent company, Centene Corporation, coordinates an annual audit for each vendor, like LogistiCare, that serves multiple Centene affiliates in multiple states. LHCC would request monthly (versus quarterly) JOC meetings if performance levels fall below accepted requirements. Ongoing performance deficiencies may result in sanctions or termination of the agreement, and is specified in the Transportation Vendor Agreement between LHCC and LogistiCare. LHCC's Quality Assurance Program and oversight of NEMT services is extensive and addresses every applicable operational area within the LHCC and LogistiCare organizations. Policies and procedures are customized and implemented in accordance with DHH and LHCC requirements for NEMT standards and performance measures.